

1 **SYLVIA BAIZ**

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7 UNITED STATES DISTRICT COURT  
8 SOUTHERN DISTRICT OF CALIFORNIA  
9 **(HON. THOMAS J. WHELAN)**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 **ERNESTO FLORES-BLANCO,**

14 Defendant.

) Criminal No. 07-CR-3405-W

) Date: February 11, 2008

) Time: 2:00 p.m.

) NOTICE OF MOTIONS AND  
) MOTIONS TO:

) **1) DISCLOSE DISCOVERY;**

) **2) SUPPRESS EVIDENCE**

) **AND STATEMENTS; AND**

) **3) LEAVE TO FILE FURTHER  
) MOTIONS**

17 TO: KAREN HEWITT, UNITED STATES ATTORNEY, and  
18 DAVID D. LESHNER, ASSISTANT UNITED STATES ATTORNEY

19 PLEASE TAKE NOTICE that on Monday, January , 2008 at 2:00 p.m., or as soon  
20 thereafter as counsel may be heard, the defendant, Ernesto Flores-Blanco, by and through his  
21 counsel, Sylvia Baiz hereby moves this Court to: (1) Disclose discovery; (2) Suppress  
22 evidence and statements; and (3) leave to file further motions.

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**MOTIONS**

The defendant, Ernesto Flores-Blanco, by and through his counsel, Sylvia Baiz, and pursuant to Fed. R. Crim. P. 12, the Fourth Amendment, the Sixth Amendment, the Fourteenth Amendment, and all other applicable rules and statutes, hereby moves this Court to:

- (1) Disclose Discovery;
- (2) Suppress evidence and statements; and
- (3) leave to file further motions.

These motions are based upon the instant motions, the notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-entitled cause, and any and all other information that may be brought to the Court's attention prior to or during the hearing on these motions.

Respectfully submitted,

Dated: January 28, 2008

/S/ Sylvia A. Baiz  
**SYLVIA BAIZ**  
Attorney for Defendant Flores-Blanco